

FELICELLO

Michael James Maloney
Partner

Felicello Law P.C.
366 Madison Avenue
3rd Floor
New York, NY 10017

Tel. +1 (212) 584-7806
mmalone@felicellolaw.com

VIA ECF

August 18, 2023

Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-VF (S.D.N.Y.)
Briefing schedule re: Mr. Guo's Expenses

Dear Judge Figueredo:

We represent Dr. Vincent Wenyong Shi (“Dr. Shi”). We write jointly with counsel for Robert W. Seiden, the court-appointed receiver (the “Receiver”), and plaintiff Wayne Baliga (“Plaintiff”) to request a scheduling order for briefing regarding the issue of Mr. Guo’s expenses, as requested in the Report & Recommendation (the “R&R”) issued on August 11, 2023 (Dkt. 466).

- Shi shall submit his briefing and objections to Guo’s expense claims on or before Monday, September 18, 2023;
- Any response to Shi’s briefing shall be filed on or before Tuesday, October 10, 2023; and
- Any reply in further support of Shi’s objections shall be filed on or before Friday, October 24, 2023.

After a Report & Recommendation is issued concerning Guo’s expenses, the parties will meet and confer regarding a schedule concerning supplemental briefing concerning the Receiver’s fee-shifting application. I have met and conferred with counsel for the Receiver and Plaintiff who join in this request.

Respectfully submitted,

/s/ Michael James Maloney

Michael James Maloney

cc: All counsel of record (via ECF)